

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 DAVID NEIL THOMPSON,
(a.k.a. DAVID THOMPSON JR.),
D-2 JOSHUA DESHAWN THOMAS, and
D-3 DAVID NEIL THOMPSON,

Defendants.

Case: 4:22-cr-20520
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 10-12-2022

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846 and 841(a)(1))

**Conspiracy to Possess with Intent to Distribute and to
Distribute Methamphetamine**

**D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.), and
D-2 JOSHUA THOMAS**

From a date unknown to the Grand Jury, but since at least August 12, 2022, to on or about October 6, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.), and JOSHUA THOMAS, knowingly conspired and agreed together and with other persons, both known and

unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TWO
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.), and
D-2 JOSHUA THOMAS

On or about August 12, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.) and JOSHUA THOMAS, aided and abetted by each other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT THREE

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c))**

D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.)

On or about August 12, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.) knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), distribution of methamphetamine; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c))**

D-2 JOSHUA THOMAS

On or about August 12, 2022, in the Eastern District of Michigan, JOSHUA THOMAS, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), distribution of methamphetamine; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1))

D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.)

On or about August 17, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.) knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT SIX
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

D-3 DAVID THOMPSON

On or about August 25, 2022, in the Eastern District of Michigan, DAVID THOMPSON knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SEVEN

**Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))**

D-2 JOSHUA THOMAS

On or about August 31, 2022, in the Eastern District of Michigan, JOSHUA THOMAS knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT EIGHT

**Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))**

D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.)

On or about August 31, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.), knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, an HS Produkt, model XDM Elite, 9mm semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

D-2 JOSHUA THOMAS

On or about September 8, 2022, in the Eastern District of Michigan, JOSHUA THOMAS knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TEN
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

D-2 JOSHUA THOMAS

On or about September 13, 2022, in the Eastern District of Michigan, JOSHUA THOMAS knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT ELEVEN

**Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))**

D-2 JOSHUA THOMAS

On or about September 23, 2022, in the Eastern District of Michigan, JOSHUA THOMAS knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TWELVE

**Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))**

D-2 JOSHUA THOMAS

On or about September 28, 2022, in the Eastern District of Michigan, JOSHUA THOMAS, knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT THIRTEEN

**Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))**

D-2 JOSHUA THOMAS

On or about October 6, 2022, in the Eastern District of Michigan, JOSHUA

THOMAS knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FOURTEEN
Possession with Intent to Distribute Heroin
(21 U.S.C. § 841(a)(1))

D-2 JOSHUA THOMAS

On or about October 6, 2022, in the Eastern District of Michigan, JOSHUA THOMAS knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FIFTEEN
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

D-1 DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.)

On or about October 6, 2022, in the Eastern District of Michigan, DAVID THOMPSON (a.k.a. DAVID THOMPSON JR.), knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Glock, model 27, .40 caliber semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIXTEEN
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

D-2 JOSHUA THOMAS

On or about October 6, 2022, in the Eastern District of Michigan, JOSHUA THOMAS, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Glock, model 43X, 9mm semi-automatic handgun and a Glock GMBH, model 23, .40 caliber semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTEEN
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

D-3 DAVID THOMPSON

On or about October 6, 2022, in the Eastern District of Michigan, DAVID THOMPSON, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Smith & Wesson, model CS45 Chiefs Special, .45 caliber semi-automatic handgun; a Shandong Machinery Company, model YL12-IJ4, 12 gauge shotgun; a Smith & Wesson, .32 caliber revolver; and a Marlin

Firearms Co., model 60, .22 caliber rifle, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Seventeen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all property involved in, or property traceable to, the violations alleged in this Indictment.

THIS IS A TRUE BILL.

Dated: October 12, 2022

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/TIMOTHY M. TURKELSON
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s/ANTHONY P. VANCE
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialed.

| | | |
|--|----------------------------------|-------------|
| United States District Court Eastern District of Michigan | Criminal Case Cover Sheet | Case Number |
|--|----------------------------------|-------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

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| Companion Case Information This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Case: 4:22-cr-20520 Judge: Kumar, Shalina D. MJ: Ivy, Curtis Filed: 10-12-2022 |
|--|---|

Case Title: USA v. DAVID NEIL THOMPSON, ET. AL.County where offense occurred : GeneseeCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-mj-30421 & 22-mj-30422]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

| <u>Defendant name</u> | <u>Charges</u> | <u>Prior Complaint (if applicable)</u> |
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 12, 2022

Date

s/TIMOTHY TURKELSON

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 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.